

ERPP-Volume III
B. Holt -- Comments

I scanned the contents to get a feeling for any broad, structural shortcomings and found few.

1. A clear, simple roadmap for lay readers is needed to convey a sense of the forest comprised of the ten thousand trees described in volume III. (See my earlier e-mail).

2. It is difficult to get a sense of what will be done first and why as opposed to the structure and process of the public/private/nonprofit bureaucracy that will set priorities. After reading portions of this several times, one gets the feeling that the pieces are given, but in a fragmented manner. Yet, it is hard to do markedly better short of expanding upon some sort of brief overview as described in prior e-mail. It seems, after some scrutiny, that the focus will indeed be on physical processes and emergency actions for endangered species, with habitat restoration coming second, and species-specific actions for unlisted species coming last. Yet, if this is indeed the general plan, it isn't stated clearly. There are lengthy discussions of process and criteria, but no application of those criteria to even broadest outlines of specific actions.

3. The composition of the various groups in the adaptive management process is unclear. It seems we will have technical panels that clearly address components of the ecosystem, a BDAC-like policy group to make resource allocation decisions between broad categories of effort (levees, water quality, and the like), and some workgroup-like hybrid of these two to set implementation priorities. It thus seems we will, by default, rely on arguments/discussions among the policy generalists and technical specialists to get a technically competent perspective of the whole. That will probably work but it would seem that some specifics could be given. As it stands this volume leaves one with the impression of abstractness despite the presence of considerable in the later portions.